

Message

From: Pavitt, John [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31D144BE2F8043A2B6DE245E1706134A-PAVITT, JOHN]
Sent: 11/5/2019 5:53:10 PM
To: Saaid, Adam H (DEC) [adam.saaid@alaska.gov]
CC: Olds, Jason R (DEC) [jason.olds@alaska.gov]; Turner, Thomas E (DEC) [tom.turner@alaska.gov]; Coss, Pablo M (DEC) [Moses.coss@alaska.gov]
Subject: RE: CDX CEDRI Review Notification for COSMOPOLITAN PROJECT

Adam, after our phone call yesterday I confirmed by office will approve my travel to the facility on Wed 11/13, the date we discussed.

I'll fly Anchorage-Kenai, arriving about 9:00 am, and will rent a car and rendezvous with you near the facility at about 10:30. Let's talk again later this week or Tue next week after the holiday to nail down logistics and inspection focus areas. I'm pulling available records from CEDRI to see what we can learn about OOOOa compliance.

Sincerely,

John Pavitt, Air Compliance Inspector
Air and Toxics Enforcement Section
U.S. EPA Region 10
Alaska Operations Office
Anchorage, AK
Phone: (907) 271-3688

From: Pavitt, John
Sent: Monday, November 04, 2019 11:32 AM
To: Saaid, Adam H (DEC) <adam.saaid@alaska.gov>
Cc: Olds, Jason R (DEC) <jason.olds@alaska.gov>; Turner, Thomas E (DEC) <tom.turner@alaska.gov>; Coss, Pablo M (DEC) <Moses.coss@alaska.gov>
Subject: RE: CDX CEDRI Review Notification for COSMOPOLITAN PROJECT

Adam, thanks for the heads up. I agree that a fall visit could be a good opportunity to commence an EPA inspection focusing on the federal air rule OOOOa. I also want to examine other federal air rules, like ZZZZ and the NSPS for RICE engines. I imagine it may take several visits to go over all the issues, so I'm fine with breaking it into parts and later pulling all available information together. We may find, for example, that the full picture tells us that additional State permitting is required, or that additional federal air rules apply.

Let's talk in the days ahead about inspection objectives for a November site visit.

Sincerely,

John Pavitt, Air Compliance Inspector
Air and Toxics Enforcement Section
U.S. EPA Region 10
Alaska Operations Office
Anchorage, AK
Phone: (907) 271-3688

From: Saaid, Adam H (DEC) <adam.saaid@alaska.gov>

Sent: Monday, November 04, 2019 10:00 AM

To: Pavitt, John <Pavitt.John@epa.gov>

Cc: Olds, Jason R (DEC) <jason.olds@alaska.gov>; Turner, Thomas E (DEC) <tom.turner@alaska.gov>; Coss, Pablo M (DEC) <Moses.coss@alaska.gov>; Saaid, Adam H (DEC) <adam.saaid@alaska.gov>

Subject: RE: CDX CEDRI Review Notification for COSMOPOLITAN PROJECT

Hello John,

We've been working on scheduling a fall on-site inspection at BlueCrest (not related to an FCE). I'm hoping to accomplish this in November (in October I requested BlueCrest provide me dates when they would be available for an inspection, and I just heard back from them that any time in the next two weeks works for them). So let's touch base soon to discuss BlueCrest's OOOOa activities. That said, BlueCrest is currently operating under a **minor** permit (AQ1385MS503), so ADEC does not have authority to enforce OOOOa compliance at that source.

Since BlueCrest is also operating under a COBC, and (being a minor source) their next scheduled FCE isn't until 2023, I anticipate we will conduct a few additional on-site inspections along the way between now and then (such as the one we're hoping to accomplish this fall). Might be a good opportunity to do a joint ADEC/EPA inspection wherein you could focus on the OOOOa elements.

Thanks,

Adam H. Saaid

Environmental Program Specialist III
Enforcement Officer
Alaska Department of Environmental Conservation
Anchorage Compliance Office
(907) 269-7693

From: Pavitt, John [<mailto:Pavitt.John@epa.gov>]

Sent: Wednesday, October 30, 2019 8:27 AM

To: Saaid, Adam H (DEC) <adam.saaid@alaska.gov>

Cc: Olds, Jason R (DEC) <jason.olds@alaska.gov>; Turner, Thomas E (DEC) <tom.turner@alaska.gov>; Coss, Pablo M (DEC) <moses.coss@alaska.gov>

Subject: FW: CDX CEDRI Review Notification for COSMOPOLITAN PROJECT

HPV Update

FYI, Blue Crest submitted an Subpart OOOOa compliance report to EPA. I'll pull the report and share it with you.

They apparently have activities going on that are outside of the scope of issues we've been discussing in the HPV calls. We should become familiar with their OOOOa activities in Alaska.

Sincerely,

John Pavitt, Air Compliance Inspector
Air and Toxics Enforcement Section
U.S. EPA Region 10

Alaska Operations Office
Anchorage, AK
Phone: (907) 271-3688

From: CEDRI <NoReply@epacdx.net>
Sent: Tuesday, October 29, 2019 4:36 PM
To: Pavitt, John <Pavitt.John@epa.gov>
Subject: CDX CEDRI Review Notification for COSMOPOLITAN PROJECT

State Reviewer Notification

This e-mail is to inform you that the following submission package was successfully signed and has reached CEDRI. To view each report in this submission package, click the link(s) under "Report Type", and then log into the CDX.

Submission Details:

Submission Package Name: Subpart OOOOa Process Unit Semi-Annual Report - 40 CFR 60.5422(a)(a) Oct 2019
Submission Date/Time: Oct 29, 2019 8:36:19 PM
Certifier Name: Mr Jacqueline Rose
Certifier Organization: BlueCrest Alaska
Certifier Facility: COSMOPOLITAN PROJECT
Facility Address: PATHFINDER ROAD
ANCHOR POINT, AK 99556
EPA Facility Id: 110067569143
CROMERR Activity ID: _da5f32a8-9001-47e3-ba4d-291d2d46bf0a

Report Name	Report Type	Regulation Part/Subpart	Public Release Date via WebFIRE
<u>60.5422a(a)</u> <u>Semiannual Report</u>	<u>Periodic</u> <u>Report</u>	Part 60 - Standards of Performance for New Stationary Sources (NSPS) AK - Subpart OOOOa - Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after 9/18/2015	Nov 28, 2019

You must use the Electronic Reporting Tool (ERT) to view the performance test (.acddb) files. If you do not have the current ERT, please download the current ERT to open and review the performance test report. The tool is located at <https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>.